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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

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Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**EX PARTE MOTION OF THE
OFFICIAL COMMITTEE OF TORT
CLAIMANTS PURSUANT TO B.L.R.
9006-1 REQUESTING ORDER
SHORTENING TIME FOR HEARING
ON MOTION FOR ENTRY OF AN
ORDER DIRECTING SUPPLEMENTAL
DISCLOSURE IN THE FORM OF A
LETTER FROM THE TCC**

[Related Dkt. Nos. 6340, 6353, 6448, 6483]

[No hearing requested]

The Official Committee of Tort Claimants (hereafter, the “**TCC**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) of PG&E Corporation and Pacific Gas and Electric Company (collectively, the “**Debtors**” or “**PG&E**”), hereby submits this Motion (the “**Motion to Shorten Time**”), pursuant to Rule 9006-1 of the Bankruptcy Local Rules for the United States Bankruptcy Court for the Northern District of California (the “**Bankruptcy Local Rules**”), for entry of an order directing the Solicitation Agent¹ to send supplemental disclosure in the form of a letter (the “**Motion**”). In support of this Application, the TCC submits the Declaration of Lauren T. Attard (the “**Attard Declaration**”) filed contemporaneously herewith. A proposed form of order granting the relief requested herein is annexed hereto as **Exhibit A** (the “**Proposed Order**”).

MEMORANDUM OF POINTS AND AUTHORITIES

I. JURISDICTION

The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334, the Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges, General Order 24 (N.D. Cal.), and Bankruptcy Local Rule 5011-1(a). This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

II. BASIS FOR RELIEF SOUGHT

The TCC is requesting that the Court hear the Motion at the Court’s already-scheduled PG&E hearing on Tuesday, April 7, 2020. The TCC requests such shortened time because the Solicitation Packages have been distributed, voting on the Plan is going on now and the Fire Victim Claimants need to receive the TCC’s official position today, not in one, two or three weeks.

When the Debtors requested that the Court hear their supplemental disclosure on 24 hours’ notice because the Solicitation Packages were about to be sent to claimants, the TCC and the other parties agreed, and the Court agreed. *See* Attard Declaration at ¶¶ 3-4. Here, the TCC originally planned to file the Motion on Friday, April 3, 2020, and have its Motion heard four days after filing (including the weekend). Attard Declaration at ¶ 7. Debtors’ counsel reviewed the Proposed Letter on Friday, April 3, 2020, and did not consent to the Motion to Shorten Time. Attard Declaration at ¶ 6. The TCC was requested to delay filing the Motion until Monday, April 6, 2020, in order for

¹ Capitalized terms not defined herein shall have the meaning ascribed to them in the TCC Motion.

1 discussions to take place on Friday, April 3, 2020, and over the weekend, which have occurred.
2 Attard Declaration at ¶ 7.

3 Accordingly, the TCC requests that the Court follow the saying, “what’s good for the goose
4 is good for the gander,” and approve that notice be shortened to permit the TCC Motion to be heard
5 on April 7, 2020, during the Court’s scheduled PG&E hearing time.

6 **III. NOTICE**

7 Notice of this Motion to Shorten Time will be provided to (i) counsel to the Debtors; (ii)
8 the Office of the U.S. Trustee for Region 17 (Attn: Andrew R. Vara, Esq. and Timothy Laffredi,
9 Esq.); (iii) counsel to the Creditors Committee; (iv) the Securities and Exchange Commission;
10 (v) the Internal Revenue Service; (vi) the Office of the California Attorney General; (vii) the
11 California Public Utilities Commission; (viii) the Nuclear Regulatory Commission; (ix) the Federal
12 Regulatory Commission; (x) the Office of the United States Attorney for the Northern District of
13 California; (xi) counsel for the agent under the Debtors’ debtor in possession financing facility;
14 (xii) the Consenting Fire Claimant Professionals; (xiii) counsel for the Shareholder Proponents; and
15 (xiv) those persons who have formally appeared in these chapter 11 cases and requested service
16 pursuant to Bankruptcy Rule 2002. The TCC respectfully submits that no further notice is required.

17 No previous request for the relief sought herein has been made by the TCC to this or any
18 other court.

19 **WHEREFORE**, the TCC respectfully requests entry of an order granting the Motion to
20 Shorten Time, and such other and further relief as the Court may deem just and appropriate.

21 Dated: April 6, 2020

22 BAKER & HOSTETLER LLP

23 By: /s/ Lauren T. Attard
24 Lauren T. Attard

25 *Counsel for Official Committee of Tort*
26 *Claimants*
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